

Exhibit 2

September 25, 2018

Via Electronic Mail

Kate Bailey
Trial Attorney
United States Department of Justice
Civil Division – Federal Programs Branch
20 Massachusetts Avenue, NW
Room 7214
Washington, D.C. 20530

Re: Outstanding discovery matters that require resolution in *State of New York, et al.*
v. United States Department of Commerce, et al., 18-cv-2921 (JMF).

Dear Ms. Bailey:

Plaintiffs write to request that Defendants produce the materials identified in Attachment A immediately. Defendants' contention that Dr. Abowd's report is "not deficient," *see* email from Kate Bailey dated 9/24/18, is belied by the facts of this case and the law. Plaintiffs are entitled to the materials set forth in Attachment A pursuant to the Federal Rules; moreover, these materials are responsive to Plaintiffs' existing document requests.

Sincerely,

/s/Elena S. Goldstein
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By: /s/ Dale Ho

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49(c)(3).*

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ATTACHMENT A

1. A list identifying all documents and materials, including but not limited to any data, you relied on, used, referenced, consulted or considered in developing your opinions in this case.
 - a. To the extent the documents and materials have already been produced in response to Plaintiffs' discovery requests in this matter, the list should identify the Bates range for each item.
 - b. To the extent the documents and materials have not already been produced in response to Plaintiffs' discovery requests in this matter, these materials should be produced.
2. All documents analyzing the potential or actual effects of the 1990 census race question;
3. All documents analyzing the potential or actual effects of the addition of the Hispanic origin question to the 1970 census; and
4. All documents analyzing the potential or actual effects of adding a question to collect Social Security Numbers from census respondents.